

EXHIBIT 3

1
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE SOUTHERN DISTRICT OF NEW YORK
4 Civil No.: 19 Civ. 08655 (LGS) (GWG)

5 -----x
6 ULKU ROWE,

7 Plaintiff,

8
9 - against -

10 GOOGLE LLC,

11 Defendant.

12 -----x

13 October 14, 2020

14 9:39 a.m.

15 Videotaped Deposition of ULKU ROWE,
16 taken by Defendant, pursuant to Notice,
17 held via Google Hangouts videoconference,
18 before Todd DeSimone, a Registered
19 Professional Reporter and Notary Public of
20 the States of New York and New Jersey.

1 U. ROWE

2 mentioned that name a couple of times
3 today, are you referring to Diane Greene?

4 A. I am, yes.

5 Q. And just for the record, who is
6 Diane Greene?

7 A. Diane Greene used to be the CEO
8 of Google Cloud.

9 Q. And have you ever met Diane
10 Greene?

11 A. I have never had a one-on-one
12 with him, sorry, her, but I have been in,
13 you know, in meetings and I have seen her
14 live.

15 Q. When you say you have seen her
16 live, do you mean you have seen her speak
17 at events?

18 A. Town halls and meetings.

19 Q. And have you ever had a
20 one-on-one face-to-face conversation with
21 Diane Greene?

22 A. I have not.

23 Q. Have you ever had any
24 substantive communications with Diane
25 Greene via any other means?

1 U. ROWE

2 A. I mean, I don't know what you
3 mean by substantive. We have been in
4 e-mails together, but I didn't have a
5 one-on-one with her.

6 Q. When you say you have been on
7 e-mails together, is that e-mails where she
8 may be CC'd on communications going on
9 between you and others in Tariq's
10 organization?

11 A. Yes, those would be examples.

12 Q. Can you think of any instances
13 where you and Diane Greene were e-mailing
14 back and forth between the two of you?

15 A. No, I can't remember.

16 Q. And you were never interviewed
17 by Diane Greene for the head of financial
18 services role, correct?

19 A. I was scheduled to interview
20 with her, which got cancelled.

21 Q. And it got cancelled because it
22 was announced that she was leaving Google
23 Cloud, correct?

24 A. Correct, that's what I was
25 told.